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United States Government

Department of Energy

# memorandum

DATE: October 4, 2001

REPLY TO  
ATTN: **EM-1**

SUBJECT Policy for Content and Implementation of Corrective Action Plans (CAP')

TO: Distribution (Field Office Managers)

References: 1. Memorandum from B. Richardson to All Departmental Elements, "Implementation Plan for Defense Nuclear Facilities Safety Board (DNFSB) Recommendation 98-1," dated March 10, 1999.

The reference implementation plan provides the basic policy for the content and implementation of CAPs, as follows:


- a. The line manager prepares a single, comprehensive CAP to address the identified issues contained in a single independent oversight assessment report.
- b. CAPs include actions to correct any unclear variance from requirements, and actions to determine root cause and prevent recurrence of the issue.
- c. CAPs provide the line management's basis for disposition of the identified safety issues, demonstrating how safety will be maintained. This includes; describing how actions will be tracked to closure, the measure of performance, mechanism for verification of closure, and assurance that actions are appropriate to prevent recurrence.
- d. The CAP is to be approved within 60 days of issuance of the formal independent oversight assessment report. If the CAP cannot be approved within that time frame, then the line manager must formally request an extension from the Cognizant Secretarial Office (CSO) and provides to the Office of Oversight.
- e. The line manager is responsible for ensuring the timely and effective implementation of the corrective actions by the Department and its contractor organizations. The line manager ensures that corrective actions are effectively tracked to closure, emphasizing correction of the root causes to minimize recurrence.
- f. Closure verifications will be conducted by the line manager, from organizations with staff that are independent of the manager and staff responsible for development, implementation and closure of corrective actions.

These basic expectations are currently not being met fully in the CAPs I have reviewed. As the approval authority for the CAPs, I want to reiterate that this is my policy. The following provides some additional policy enhancements intended to strengthen the CAPs.

- 1) CAPs should include both DOE and contractor corrective actions.

- 2) Root cause analysis needs to be provided for each issue. Additionally, specific problem areas may be of such significance that root cause analysis is required. The root cause analysis needs to demonstrate that it addresses systemic issues.
- 3) Each action needs to have a measure of performance to demonstrate the outcome has resulted in an improvement that will prevent recurrence.
- 4) There needs to be a documented basis for line manager's determination that the actions appropriately address the issues and problem areas.
- 5) There needs to be an analysis of the line manager's management systems to identify improvements actions which strengthen the ability to identify **and** correct contractor implementation issues.
- 6) Closure of corrective actions from the **Corrective Action Tracking System (CATS)** includes a validation **and** measure of effectiveness component. The line manager must provide EM-1 the certification/basis for closure that includes; verification/validation, determination of effectiveness of actions to address the root cause, a documented basis for completion of the action, and a discussion on what the measure of effectiveness is and how the achievement of the improvement will be evaluated in the future.

Effective immediately, this policy will be used as the basis for **CAP** approval. If you have any questions, please contact me, or your staff may contact Paul Golan at 202/586-5784.

  
Jessie Hill Roberson  
Assistant Secretary for  
Environmental Management

*cc:*

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